

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

JONAH P. ROSS (CABN 305076)
Assistant United States Attorneys

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3713
FAX: (510) 637-3724
Email: jonah.ross@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 4:24-CR-00225-HSG
)	
Plaintiff,)	STIPULATION AND ORDER TO CONTINUE
)	CHANGE OF PLEA HEARING, AND TO
v.)	EXCLUDE TIME AND EXTEND DEADLINE
)	UNDER THE SPEEDY TRIAL ACT TO APRIL
MICHAEL LEE PATTERSON,)	30, 2025
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of plea hearing for defendant Michael Lee Patterson scheduled for March 26, 2025, be continued to April 30, 2025, at 2:00 p.m. for change of plea. The parties have agreed in principle on a resolution, but the parties require additional time to finalize a written plea agreement and to provide defense counsel with sufficient time to thoroughly review the plea agreement with the defendant.

The continuance is sought under the Speedy Trial Act. The parties agree and stipulate that the time until April 30, 2025 should be excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective

1 preparation of counsel and continuity of counsel because the ends of justice served by the granting of the
2 continuance outweigh the best interests of the public and defendant in a speedy and public trial for the
3 reasons described above.

4
5 IT IS SO STIPULATED.

6
7 DATED: March 24, 2025

8 /s/
JONAH P. ROSS
Assistant United States Attorney

9
10 DATED: March 24, 2025

11 /s/
LANCE K. KUBO
Counsel for Defendant Michael Lee Patterson


ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea hearing for defendant Michael Lee Patterson, currently scheduled for March 26, at 2:00 p.m., is continued to April 30, 2025, at 2:00 p.m. for change of plea before the Honorable Haywood S. Gilliam, Jr.

IT IS FURTHER ORDERED that the time until April 30, 2025, is hereby excluded from the Speedy Trial Act, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation taking into account due diligence, and continuity of counsel. The Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendant in a speedy, public trial.

IT IS SO ORDERED.

Dated: 3/24/2025


HON. HAYWOOD S. GILLIAM, JR.
United States District Judge